

FILED

W. CARY EDWARDS  
ATTORNEY GENERAL OF NEW JERSEY

June 2, 1988

NEW JERSEY STATE BOARD  
OF MEDICAL EXAMINERS

By: STEVEN N. FLANZMAN  
DEPUTY ATTORNEY GENERAL  
Division of Law, Room 316  
1100 Raymond Boulevard  
Newark, New Jersey 07102  
Tel. (201) 648-4727

STATE OF NEW JERSEY  
DEPARTMENT OF LAW & PUBLIC SAFETY  
DIVISION OF CONSUMER AFFAIRS  
BOARD OF MEDICAL EXAMINERS  
DOCKET NO.

IN THE MATTER OF THE SUSPENSION  
OR REVOCATION OF THE LICENSE OF

STEPHAN NILS REED, D.C.

TO PRACTICE CHIROPRACTIC  
IN THE STATE OF NEW JERSEY

Administrative Action

COMPLAINT

W. Cary Edwards, Attorney General of New Jersey, by  
Steven N. Flanzman, Deputy Attorney General, with offices located  
at the Division of Law, Room 316, 1100 Raymond Boulevard, Newark,  
New Jersey 07102, by way of Complaint says:

COUNT I

1. Complainant Attorney General of New Jersey is  
charged with enforcing the laws of the State of New Jersey pursuant  
to N.J.S.A. 52:17A-4, and is empowered to initiate administrative  
disciplinary proceedings against persons licensed by the Board of  
Medical Examiners pursuant to N.J.S.A. 45:1-14 et seq.

2. The New Jersey State Board of Medical Examiners is charged with the duty and responsibility of regulating the practice of chiropractic in the State of New Jersey pursuant to N.J.S.A. 45:9-41.5 et seq. and N.J.S.A. 45:1-14 et seq.

3. Respondent Stephan Nils Reed, D.C. is a licensed chiropractor in the State of New Jersey, and has been a licensee during all times pertinent hereto.

4. In or about September 1986, Indictment No. 1346-9-86 issued against Stephan Nils Reed. The indictment charged that Reed, on or about January 20, 1986 in the City of Bayonne, "did purposely or knowingly cause the death or serious bodily injury resulting in the death of Lorraine Quinn in that said Stephen Nils Reed committed the homicidal act by his own conduct, contrary to the provisions of N.J.S. 2C:11-3(a)(1) or 2C:11-3(a)(2)." A copy of said indictment is included within the copy of the certified copy of Plea and Indictment No. 1346-9-86 appended hereto as Exhibit "A."

5. On October 6, 1987, Stephan Nils Reed entered a plea of guilty to manslaughter in the second degree (with sentencing to be in the third degree). As set forth in N.J.S. 2C:11-4, "criminal homicide [defined at N.J.S. 2C:11-2 to be the purposeful, knowing, [or] reckless, ... [causing] of the death of another human being] constitutes manslaughter when: (1) It is committed recklessly; or (2) A homicide which would otherwise be murder ... is committed in the heat of passion resulting from a reasonable provocation." A copy of a statement by Defendant Reed, wherein Reed pled guilty to

N.J.S. 2C:11-4, is included within the copy of the certified copy of Plea and Indictment No. 1346-9-86 appended hereto as Exhibit "A."

6. On January 22, 1988, Defendant Stephan Nils Reed was convicted of manslaughter, as that crime is set forth at N.J.S. 2C:11-4. Pursuant to said conviction, Reed was sentenced to five (5) years probation, conditioned upon his submitting to random drug testing and counselling under the supervision of the Probation Department and his serving 500 hours of community service, fined \$7,500 and assessed a \$30 Violent Crimes Compensation Board penalty. A copy of a certified copy of the Judgment of Conviction on Indictment No. 1346-09-86, in the case of The State of New Jersey v. Stephan Nils Reed, is appended hereto as Exhibit "B."

7. The aforereferenced conviction of Stephan Nils Reed of the crime of manslaughter, constitutes the conviction of a crime involving moral turpitude and/or a crime relating adversely to the activity regulated by the Board of Medical Examiners and thus is grounds for the Board of Medical Examiners to suspend or revoke the license of Stephan Nils Reed to practice chiropractic in the State of New Jersey pursuant to N.J.S.A. 45:1-21(f) and N.J.S.A. 45:9-16(c).

WHEREFORE, Complainant demands judgment against Respondent Stephan Nils Reed as follows:

1. The suspension or revocation of the license heretofore issued to respondent Stephan Nils Reed to practice chiropractic in the State of New Jersey;

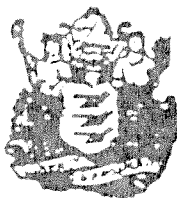
2. An Order directing respondent Stephan Nils Reed to cease, desist and refrain from the practice of chiropractic in the State of New Jersey;
3. Imposition of penalties for each separate unlawful act as set forth above;
4. Costs, including investigative costs, fees for expert witnesses, and costs of trial, including transcripts;
5. Such other and further relief as the Board of Medical Examiners shall deem just and appropriate.

W. CARY EDWARDS  
ATTORNEY GENERAL OF NEW JERSEY

By Steven Neil Flanzman  
Steven Neil Flanzman  
Deputy Attorney General

DATE MAY 27, 1988

# STATE OF NEW JERSEY



HUDSON COUNTY, ss:

I, FRANK E. RODGERS, Clerk of the County of Hudson aforesaid and

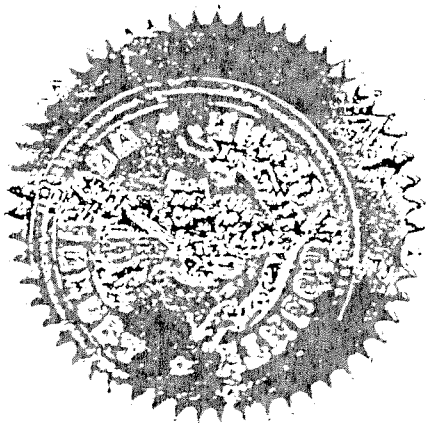
also Deputy Clerk of the Superior Court of New Jersey holden therein

DO HEREBY CERTIFY, That the foregoing is a true and correct copy of

Certify Copy of Plea and Indictment 1346-9-86, in the case of

The State of New Jersey -VS- STEPHAN NILS REED.

as the same is taken from and compared with the original as recorded and filed in my office.



IN TESTIMONY WHEREOF, I have hereunto set my hand  
and affixed the seal of the said Court and County, at  
Jersey City

this ..... 15th .....  
day of January ..... 1988

*Frank E. Rodgers*  
Clerk

Exhibit A

County

~~SUPERIOR~~ COURT OF NEW JERSEY

HUDSON COUNTY

LAW DIVISION—CRIMINAL BRANCH

19 87

TERM 1st SESSION

2nd PANEL - C

THE STATE OF NEW JERSEY

INDICTMENT NO:

1346 09 86

VS.

STEPHAN NILS REED

DEFENDANT

CHARGE: MURDER(NJS 2C:11-3(a)(1) or 2C:11-3(a)(2))

1.

2.

3.

THE GRAND JURORS OF THE STATE OF NEW JERSEY, FOR THE COUNTY  
OF HUDSON UPON THEIR OATHS, PRESENT THAT STEPHAN NILS REED

ON OR ABOUT THE 20th DAY OF January 1986, in the City of  
Bayonne IN THE COUNTY OF HUDSON AFORESAID

AND WITHIN THE JURISDICTION OF THIS COURT, did purposely or knowingly cause the  
death of or serious bodily injury resulting in the death of Lorraine Quinn  
in that said STEPHAN NILS REED committed the homicidal act by his own conduct,  
contrary to the provisions of N.J.S. 2C:11-3(a)(1) or 2C:11-3(a)(2),

AGAINST THE PEACE OF THIS STATE, THE GOVERNMENT AND DIGNITY OF THE SAME.

VS/rjc

*Paul M. De Pascale*  
PAUL M. DE PASCALE, PROSECUTOR

TRUE BILL

ASSIGNED TO THE SUPERIOR COURT

FOREMAN

19

ASSIGNMENT JUDGE SUPERIOR COURT

PRESENTED:

Stephen Nils Reed

## 1. YOU ARE CHARGED WITH THE FOLLOWING:

INDICTMENT/ACCUSATION NO.	COUNT	NATURE OF OFFENSE	MAXIMUM PENALTY
<u>1346-09-86</u>	<u>      </u>	<u>murder - NJS 2C:11-3(a)(1)</u>	<u>LIFE / 100,000</u>
<u>      </u>	<u>      </u>	<u>or 2C:11-3(a)(2)</u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

- a. HAVE THE OFFENSES LISTED ABOVE BEEN EXPLAINED TO YOU? Yes
- b. DO YOU UNDERSTAND THAT FOR ALL THE OFFENSES LISTED ABOVE THE COURT COULD IMPOSE A SENTENCE FOR A SPECIFIC TERM OF YEARS TOTALLING NOT LESS THAN 30 YEARS NOR MORE THAN LIFE YEARS, FINES TOTALLING NOT MORE THAN \$100,000, OR BOTH? Yes
- c. DO YOU UNDERSTAND THAT FOR ALL THE OFFENSES TO WHICH YOU ARE PLEADING GUILTY THE COURT COULD IMPOSE A SENTENCE FOR A SPECIFIC TERM OF YEARS TOTALLING NOT LESS THAN 8 YEARS NOR MORE THAN 10 YEARS, FINES TOTALLING NOT MORE THAN \$100,000 OR BOTH? YES

2. HAS THE PROSECUTOR PROMISED EITHER TO RECOMMEND THE DISMISSAL OF ANY CHARGE AGAINST YOU OR RECOMMEND THAT A PARTICULAR SENTENCE BE GIVEN TO YOU, OR BOTH? amended to murder  
PUT THE NUMBER OF ANY INDICTMENT, COUNT OF ANY INDICTMENT, ACCUSATION OR COMPLAINT TO BE DISMISSED HERE: NJS 2C:11-3(a)(1) or 2C:11-3(a)(2) to be amended  
WRITE OUT THE SPECIFIC SENTENCE RECOMMENDATION YOU WERE PROMISED. 2nd degree  
plea - 3rd degree sentence - prosecutor waives appeal as to any  
sentence including probation use of death drug overdose - self  
The Judge is not bound by those promises. If he decides not to follow the recommendations, you will be allowed to take back your guilty plea and plead not guilty. indicted by

3. HAVE ANY OTHER PROMISES, RECOMMENDATIONS OR INDUCEMENTS BEEN MADE TO YOU BY THE PROSECUTOR OR ANYONE ELSE CONCERNING THIS PLEA OF GUILTY? yes. IF YOUR ANSWER WAS YES, EXPLAIN WHAT WAS TOLD TO YOU. State will not contest defendants or  
decedant's medical condition or prior involvement in the state acknowledge by  
that the decedant was a drug addict
4. DID ANYONE THREATEN OR FORCE YOU IN ANY WAY TO CAUSE YOU TO OFFER THIS PLEA OF GUILTY? NO. IF YOU ANSWERED YES, EXPLAIN THE NATURE OF THE FORCE OR THREATS AND WHO MADE THEM. and  
consequence  
druggan

5. IN VIEW OF YOUR ANSWERS TO THE ABOVE, DO YOU NOW ENTER A PLEA OF GUILTY TO 2C:11-4 manslaughter sentence 3rd degree YES No  
consequence  
By
6. DID ANYONE HELP OR ASSIST YOU TO WRITE THE ANSWERS TO THESE QUESTIONS? yes Proceed  
IF YOUR ANSWER IS YES, WHO HELPED YOU? Bertam Siegel Esq. at  
time
7. MY ATTORNEY HAS EXPLAINED TO ME (1) THE APPLICABILITY OF AN EXTENDED TERM OF IMPRISONMENT; (2) THAT THE COURT MAY BE REQUIRED TO OR CAN IMPOSE A TERM OF PAROLE INELIGIBILITY, OR BOTH; (3) PROBLEMS OF MERGER OF OFFENSES; (4) MANDATORY PENALTIES UNDER N.J.S.A. 2C:35-15 (DRUG ENFORCEMENT AND DEMAND REDUCTION); N.J.S.A. 2C:43-3.1 (VCCB); (5) MANDATORY FORENSIC LAB FEES UNDER N.J.S.A. 2C:35-20; (6) MANDATORY FORFEITURE OF DRIVING PRIVILEGES UNDER N.J.S.A. 2C:35-16; AND (7) RESTITUTION AND/OR COMMUNITY SERVICE AS A CONDITION OF SENTENCE, AS ANY OF THE FOREGOING APPLY TO THIS PLEA. maxim  
sentence  
3 to 5  
years

Date: October 6, 1987Signed by: Stephen Nils Reed

Defendant

maximum  
Fine \$150

I CERTIFY THAT THE FOREGOING QUESTIONS AND ANSWERS WERE DISCUSSED WITH THE DEFENDANT, THAT THEY ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS STATEMENT WAS SIGNED BY THE DEFENDANT IN MY PRESENCE.

- a. HAVE THE OFFENSES LISTED ABOVE BEEN EXPLAINED TO YOU? Yes
- b. DO YOU UNDERSTAND THAT FOR ALL THE OFFENSES LISTED ABOVE THE COURT COULD IMPOSE A SENTENCE FOR A SPECIFIC TERM OF YEARS TOTALLING NOT LESS THAN 30 YEARS NOR MORE THAN LIFE YEARS, FINES TOTALLING NOT MORE THAN \$100,000, OR BOTH? Yes
- c. DO YOU UNDERSTAND THAT FOR ALL THE OFFENSES TO WHICH YOU ARE PLEADING GUILTY THE COURT COULD IMPOSE A SENTENCE FOR A SPECIFIC TERM OF YEARS TOTALLING NOT LESS THAN 3 YEARS NOR MORE THAN 10 YEARS, FINES TOTALLING NOT MORE THAN \$100,000 OR BOTH? Yes
2. HAS THE PROSECUTOR PROMISED EITHER TO RECOMMEND THE DISMISSAL OF ANY CHARGE AGAINST YOU OR RECOMMEND THAT A PARTICULAR SENTENCE BE GIVEN TO YOU, OR BOTH? announced to me PUT THE NUMBER OF ANY INDICTMENT, COUNT OF ANY INDICTMENT, ACCUSATION OR COMPLAINT TO BE DISMISSED HERE: NJS 2C:11-3(a)(1) or 2C:11-3(a)(2) to be amended 2nd degree WRITE OUT THE SPECIFIC SENTENCE RECOMMENDATION YOU WERE PROMISED. 2nd degree plea - 3rd degree sentence - Prosecutor waives appeal as to any sentence including probation because of death drug overdose - self The Judge is not bound by those promises. If he decides not to follow the recommendations, you will be allowed to take back your guilty plea and plead not guilty. indicted by
3. HAVE ANY OTHER PROMISES, RECOMMENDATIONS OR INDUCEMENTS BEEN MADE TO YOU BY THE PROSECUTOR OR ANYONE ELSE CONCERNING THIS PLEA OF GUILTY? yes. IF YOUR ANSWER WAS YES, EXPLAIN WHAT WAS TOLD TO YOU. State will not contest Defendants or decedent's medical condition or drug involvement obtained by
4. DID ANYONE THREATEN OR FORCE YOU IN ANY WAY TO CAUSE YOU TO OFFER THIS PLEA OF GUILTY? NO. IF YOU ANSWERED YES, EXPLAIN THE NATURE OF THE FORCE OR THREATS AND WHO MADE THEM. and consequence decedent
5. IN VIEW OF YOUR ANSWERS TO THE ABOVE, DO YOU NOW ENTER A PLEA OF GUILTY TO 2C:11-4 manslaughter sentence 3rd degree yes No common
6. DID ANYONE HELP OR ASSIST YOU TO WRITE THE ANSWERS TO THESE QUESTIONS? yes IF YOUR ANSWER IS YES, WHO HELPED YOU? Bertram Siegel Esq. By Prosec at time of sentence maxim sentence 3 to 5 years
7. MY ATTORNEY HAS EXPLAINED TO ME (1) THE APPLICABILITY OF AN EXTENDED TERM OF IMPRISONMENT; (2) THAT THE COURT MAY BE REQUIRED TO OR CAN IMPOSE A TERM OF PAROLE INELIGIBILITY, OR BOTH; (3) PROBLEMS OF MERGER OF OFFENSES; (4) MANDATORY PENALTIES UNDER N.J.S.A. 2C:35-15 (DRUG ENFORCEMENT AND DEMAND REDUCTION); N.J.S.A. 2C:43-3.1 (VCCB); (5) MANDATORY FORENSIC LAB FEES UNDER N.J.S.A. 2C:35-20; (6) MANDATORY FORFEITURE OF DRIVING PRIVILEGES UNDER N.J.S.A. 2C:35-16; AND (7) RESTITUTION AND/OR COMMUNITY SERVICE AS A CONDITION OF SENTENCE, AS ANY OF THE FOREGOING APPLY TO THIS PLEA. maximum Fine \$150

Date: October 6, 1987

Signed by: Sten H. Reed  
Defendant

I CERTIFY THAT THE FOREGOING QUESTIONS AND ANSWERS WERE DISCUSSED WITH THE DEFENDANT, THAT THEY ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS STATEMENT WAS SIGNED BY THE DEFENDANT IN MY PRESENCE.

Date: October 6, 1987

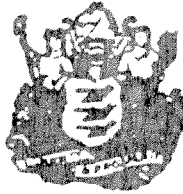
Signed by: Bertram Siegel  
Attorney for Defendant

Address: 300 R44  
PERECK N.J.

③ STATE will not contest Defendants or decedent's medical condition or drug involvement. Br



# STATE OF NEW JERSEY



HUDSON COUNTY, ss:

I, FRANK E. RODGERS, Clerk of the County of Hudson aforesaid and

also Deputy Clerk of the Superior Court of New Jersey holden therein

DO HEREBY CERTIFY, That the foregoing is a true and correct copy of

Judgment of Conviction on Indictment No. 1346-09-86, in the case of

The State of New Jersey -VS- STEPHAN NILS REED.

as the same is taken from and compared with the original as recorded and filed in my office.



IN TESTIMONY WHEREOF, I have hereunto set my hand  
and affixed the seal of the said Court and County, at  
Jersey City

this ..... 3rd .....  
February  
day of ..... 19 88

*Frank E. Rodgers*  
County Clerk

Exhibit B

SUPERIOR COURT OF NEW JERSEY  
HUDSON COUNTY  
(LAW DIVISION - CRIMINAL)

THE STATE OF NEW JERSEY

vs.

STEPHAN NILS REED

Defendant

Ind. No. 1346-09-86 S.B.I. No. 317623B  
Acc. No.                      Arrest Date 1-21-86  
Presentment Date 9-24-86

JUDGMENT OF CONVICTION  
AND DISMISSALS

Defendant on October 14, 1986

~~Ind. No.~~ 1346-09-86

having entered a plea of NOT GUILTY to  
for the crime of MURDER

the defendant, represented by B. Siegel, Esq.

include Title, Statute, and Degree)

having on October 6, 1987, retracts his  
former plea of not guilty and enters a plea of  
Guilty to Count 1 as amended, charging Manslaughter  
NJS 2C:11-4.

therefore on January 22, 1988

ndant, represented by B. Siegel, Esq.

ORDERED AND ADJUDGED that the  
be and is sentenced:

PROBATION: FOR A PERIOD OF FIVE (5) YEARS

CONDITION: THAT THE DEFENDANT SUBMIT TO RANDOM DRUG TESTING AND COUNSELLING UNDER THE  
SUPERVISION OF THE PROBATION DEPARTMENT.

FURTHER: THAT THE DEFENDANT SERVE 500 HOURS OF COMMUNITY SERVICE. THIS MAY BE PERFORMED  
OVER THE TERM OF PROBATION.

FINE: \$ 7,500.00

WCCB PENALTY: \$ 30.00

NO COSTS

RIGHT TO APPEAL AND CREDIT TO BE GIVEN FOR TIME SERVED

DISMISSALS: NONE

STATEMENT OF REASONS, R.3:21-4(e)

AGGRAVATING

**HUDSON COUNTY  
CLERK'S OFFICE**

**JERSEY CITY, N. J.**

**CERTIFIED COPY OF**

**THE STATE OF NEW JERSEY**

**-VS-**

**STEPHAN NILS REED**

**FRANK E. RODGERS  
COUNTY CLERK**